

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT, OHIO
EASTERN DIVISION**

JOHN B. BROWN
747 STALLION WAY
MARYSVILLE, OH 43040

Case No. 2:19-cv-02518
Judge Algenon L. Marbley

Plaintiff,

v.

HARTFORD FINANCIAL SERVICES GROUP, INC.
690 ASYLUM AVENUE
HARTFORD, CONNECTICUT 06155

Defendant.

AMENDED COMPLAINT

1. Plaintiff John B. Brown resides in the City of Marysville, in Union County, Ohio. Plaintiff was formerly employed at PricewaterhouseCoopers LLC (PWC) as a Director of Customer Strategy. PWC is a multinational professional services network with headquarters in London, United Kingdom. Plaintiff is a plan “participant” in the PWC Long Term Disability Benefits Plan administered by Hartford Financial Services Group, Inc.

2. Defendant Hartford Financial Services Group is an investment and insurance company. It is in Hartford, CT and is incorporated in the state of Delaware. Per the Plan, PWC has delegated its Plan Administrator duties to Hartford.

3. Plaintiff is bringing a claim under the Employee Retirement Income Securities Act (ERISA), 29 U.S.C. §1001 et seq. for improper denial of long-term disability benefits.

4. This court has federal question jurisdiction under 28 U.S.C §1331.

5. Under 28 U.S.C. §1391, venue is appropriate because Plaintiff was employed in the City of Columbus office of PWC located in Franklin County, Ohio and resides in Union County, Ohio.

6. Plaintiff's last day at work was April 20, 2019. The effective date of his receipt of disability benefits was October 20, 2016. In September 2017, Plaintiff notified Defendant that he had returned to work in a teaching capacity at Ohio HI-Point JVSD. On December 10, 2017, Defendant concluded that Plaintiff had the functional capacity to consistently perform full-time work without any restrictions or limitations. Defendant unlawfully cut off payment of Plaintiff's disability benefits

7. Plaintiff appealed the wrongful and bad faith cutoff of payments of his disability benefits on August 8, 2018.

8. On September 25, 2018, Defendant wrongfully denied Plaintiff's appeal. The denial was arbitrary and capricious and in bad faith.

9. In the appeal, Defendant upheld its decision that Plaintiff no longer qualified for LTD benefits.

10. Defendant failed to comply with the Plan's contractual requirements and wrongfully denied Plaintiff long term disability benefits.

11. In so doing, Defendant caused Plaintiff damages and violated ERISA.

WHEREFORE, Plaintiff demands judgment against Defendant in the form of:

- (a) Back benefits due;
- (b) Payment of disability benefits in accordance with the terms of the Plan;
- (c) Prejudgment and post judgment interest;
- (d) Attorney fees and costs; and
- (e) Other and further equitable or other relief as may be just and appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that this Amended Complaint, Notice of Case, and Waiver of Service of Summons was served upon Defendant's Attorney Kaitlyn Luther, via email at the address below.

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\|Emily J. Lewis\|